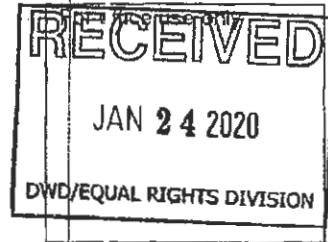


Discrimination Complaint
Wisconsin Fair Employment Law
Wis. Stat. §§ 111.31-111.395

CORRECTED
ERD Case #
CR 201903138



Authorization for this form is provided under Wis. Stat. § 111.39(1).

Personal information you provide may be used for secondary purposes [Privacy Law, Wis. Stat. § 15.04(1)(m)].

READ instructions on page two FIRST then type or print in black ink.

1. Complainant Information

First Name Jasmine		
Middle Initial S		
Last Name Oliver		
Street Address/PO Box 8221 W Oklahome Ave Apt 3		
City Milwaukee	State WI	Zip Code 53219
Telephone Number (414) 640-1505		
E-Mail Address mugsoliverjasmine@gmail.com		

2. Respondent Information

The company , agency, or union you believe discriminated against you. Name only ONE Respondent per form. <i>Do not name an individual person as Respondent.</i>		
Name Amazon.com Services Inc.		
Street Address/PO Box 3501 120th Ave		
City Kenosha	State WI	Zip Code 53144
Telephone Number (262) 859-0001		
In what Wisconsin county did the violation take place? Kenosha		

3. CHECK ONLY THE BOXES THAT WERE THE REASON FOR DISCRIMINATION

If you checked a box with an *, the statement in that box **must** be completed.

I believe the Respondent discriminated or took action against me **because**

<input type="checkbox"/> of my race * which is _____	<input type="checkbox"/> of my age (40 or older) * my date of birth is _____	<input type="checkbox"/> of my marital status * which is _____
<input type="checkbox"/> of my color * which is _____	<input type="checkbox"/> of my conviction record	<input type="checkbox"/> of my military service
<input type="checkbox"/> of my national origin/ancestry * which is _____	<input type="checkbox"/> of my arrest record	<input type="checkbox"/> of my use or nonuse of lawful products
<input checked="" type="checkbox"/> of my sex * which is Perceived transgender	<input type="checkbox"/> of my sexual orientation * which is _____	<input type="checkbox"/> of genetic testing
<input type="checkbox"/> of my pregnancy or maternity	<input type="checkbox"/> of my creed (religion) * which is _____	<input type="checkbox"/> of polygraph testing
<input checked="" type="checkbox"/> of my disability * which is PTSD, Anxiety	<input type="checkbox"/> I declined to attend a meeting or to participate in a communication about religious matters or political matters.	<input checked="" type="checkbox"/> I filed a previous discrimination complaint with Equal Rights or testified or assisted with a discrimination complaint. Enter Case # CR201902057
<input checked="" type="checkbox"/> I opposed discrimination in the workplace (refer to instruction 2(c) on page 2 of this form)		
<input type="checkbox"/> The Respondent printed or circulated, advertised or published a discriminatory statement	<input type="checkbox"/> The Respondent used a discriminatory application or made a discriminatory inquiry about prospective employment	

4. Dates of discrimination (Required; estimate if unsure)

Date the discrimination began? mm/dd/yyyy 08/28/2019	Date of the most recent discrimination? mm/dd/yyyy 01/20/2020
<input type="checkbox"/> My employment was terminated on _____ (if applicable)	

* This form covers discriminatory actions alleged under §§ 111.322(1), (2), and (3) of the Wisconsin Fair Employment Law. Discriminatory actions alleged under § 111.322(2m) must be filed using form ERD-18359, "Retaliation Complaint."

ERD-4206-E (R. 03/2018)

Kaiser Decl. Exhibit

Amended complaint revised

On August 28, 2019, I filed a corrected complaint with the Division. ERD Case Number CR201902057.

On October 3, 2019, the Division mailed a notice of my complaint to the Respondent. Even prior to the Division's mailing, I had informed the Respondent about my filing. I have been a Warehouse Associate with the Respondent since November 6, 2018.

Immediately after filing a complaint the respondent retaliated against me by placing me under increased scrutiny of work performance, by scheduling me to work only near surveillance cameras.

In addition, the respondent began identifying me as Oliver, which I believe was an act of discrimination and in support of transgender rumors. Oliver is commonly known as a male first name, which only followed after transgender rumors and my decision to file with the Division. Adding to that, the only other female identified by last name was Mcground also known as Davina, who is transgender.

In or around August/September, I experienced tampering/ loss of my personal protection equipment. The respondent as well as the harassers knew of my inability to wear the company's PPE, due to an allergic reaction. On this specific day I was stationed on a nearby wall to my harassers and once I returned to my workstation, I noticed that my glove was missing; which later resulted in an allergic reaction.

On September 3th between 8:00-9:00pm, Demarius Pompy physically shoulder shoved me while walking past; Therefore, subjecting me to a hostile work environment.

On October 5, 2019, I notified management about a faulty workstation. When the issue persisted, a coworker shouted at me. I requested to be assigned away from the coworker who verbally attacked me. The following day, I was assigned to work at the same faulty workstation. Another coworker, Alicia Reyes, who had made a similar complaint about a coworker yelling at her for the faulty workstation, was not similarly assigned to the faulty workstation again. I believe the Respondent assigned me to the faulty workstation in retaliation for my statutorily-protected activity. On November 4, 2019, I was assigned to a faulty work station and slow inducer and not provided assistance with rebining during peak time.

As a result of the respondents failure to accommodate me for anxiety, I was placed in direct proximity to my harassers and endured further harassment and retaliation; which caused me to be diagnosed with PTSD. On November 22, 2019, I turned in a written accommodation request from my doctor stating that it would be best if I didn't work in close proximity to those mentioned in my complaint. The respondent was rather facetious and failed to reasonably accommodate me, while intentionally inflicting emotional distress by consistently placing both harassers near me. I believe the respondent failed to reasonably accommodate me because of my engaged statutorily-activity.

On November 22, 2019 I attended a meeting with HR, Safety, Amcare, Senior Operations management and my direct Operations manager in an attempt to be accommodated. I provided both a verbal and written request such as more bathroom breaks, an accommodation for reliving trauma through the event of triggers concerning Harassers-Davina Mcground and Kimberly Nash(which is a PTSD symptom of avoidance), access to soft music for irritability/ mood changes and flexible/ modified schedule. My physician provided the respondent with a contact number for further information, or questions. The amcare associate stated that they will not reasonably accommodate me because the needs of the business come first.

On December 1st, 2019 I turned in a written statement in regards to not receiving any interactive process concerning a reasonable accommodation and expressed concerns regarding the release of my confidential medical information to other employees without my consent. Shortly after informing the respondent of my PTSD disability employees began making offensive comments by referring to me as the crazy girl.

On December 2nd, I was informed by Cassandra to work on a least favorable position where I experienced malfunctioning with faulty equipment, which later resulted in a negative performance review. I believe the respondent retaliated by use of workplace sabotage and punitive scheduling because I mentioned on December 1st, 2019 my intention to file a second complaint.

The respondent treated others who were in similar situations different than me because I opposed discrimination and stated that I needed to be accommodated for both PTSD as well as Anxiety.

In the month of October Kimberly Nash had an altercation with Rachel Delacruz, and the respondent responded by placing the employees on opposite ends of the department so that they are not in direct proximity.

Also Davina Mcground, who had an altercation with Kimberly Nash was asked by management if she needed to be placed on opposite ends of the department from Kimberly Nash. The respondent, stationed employees who have not provided a written accommodation request for PTSD, or Anxiety the ability to work in a hostile free work environment that supports their productivity.

Shortly after my request to be reasonably accommodated I was not assigned a station and was told by Ivonne that my manager Adam had reassigned me to be removed from the department, which is an environmental stimuli/event associated with my PTSD triggers. It is to be noted that the department has 88 pack stations, 22 rebin stations, and 22 induct stations, which is evident that the respondent could have changed my work location, so that I'm not in direct proximity to those mentioned in my complaint.

The respondent has continued to constructively assign me to work next to the harassers with the most recent date being January 14th, 2020; although I've provided proof of PTSD and a physician's recommendation for a reasonable accommodation.

Sidhu, Rupneet - DWD

From: Sidhu, Rupneet - DWD
Sent: Monday, April 6, 2020 8:08 AM
To: Jasmine Oliver
Subject: RE: ERD Case No. CR201903138 - Request to File a Corrected Complaint

Received – thank you.

Sincerely,
Rupneet Sidhu
Equal Rights Officer
(608) 733-3843

From: Jasmine Oliver <mugsoliverjasmine@gmail.com>
Sent: Sunday, April 5, 2020 2:43 AM
To: Sidhu, Rupneet - DWD <Rupneet.Sidhu@dwd.wisconsin.gov>
Subject: Re: ERD Case No. CR201903138 - Request to File a Corrected Complaint

Yes, I approve. I apologize for the late response. This Email serves as a signature for my complaint. Please let me know if you have any questions. Please confirm that you received this email.

Best regards,
Jasmine Oliver

On Wed, Mar 25, 2020 at 12:19 PM Sidhu, Rupneet - DWD <Rupneet.Sidhu@dwd.wisconsin.gov> wrote:

March 25, 2020

Via Email Only – mugsoliverjasmine@gmail.com

Dear Jasmine:

As discussed during our phone conversation today, attached please find a corrected version of your second case (CR201903138) for your review and completion. In your statement, I added a sentence related to the November 4, 2019 incident at the end of the paragraph that begins with, "On October 5, 2019" This way, all your allegations from August 28, 2019, to January 20, 2020, will be incorporated in this one case.

If you agree with the corrected complaint, please add your signature and date of signature at the end of the statement and email me the completed document. Alternatively, after you review the corrected complaint, please send me an email certifying that you read the corrected complaint and it is true and correct to the best of your knowledge and belief. Please type your full name and today's date next to the certification.